UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII, MONTANA OFFICE
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096
HELENA, MONTANA 59626-0096

Ref: 8MO

February 27, 1991

Ronald C. Prichard
Forest Supervisor
Beaverhead National Forest
610 N. Montana
Dillon, Montana 98725

Re: Upper Ruby Cattle and Horse Allotment Management Plan Draft Environmental Impact Statement

Dear Mr. Prichard:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency's Region VIII Montana Office (EPA) has reviewed the above-referenced draft Environmental Impact Statement (EIS).

The Forest Service has constructed seven alternatives, plus a "no action" alternative (Alternatives A-H). The proposed alternative (Alternative B) was developed by the Madison-Beaverhead Cooperative Stewardship Commission to better utilize upland forage to reduce grazing impacts in riparian areas. The listing of Alternative H, as a (preferred) alternative in the Summary and Chapter II Tables of this draft document introduces an element of confusion into the DEIS (i.e., proposed vs. preferred alternative).

The Forest Service has presented a great deal of information within this draft EIS. There are excellent descriptions of each alternative. Descriptions of riparian ecosystem conditions on a stream-by-stream basis are included in Appendix A. These eco-system descriptions characterize hydrology (e.g., Rosgen stream channel classification system), vegetation, soils, riparian area condition, and fisheries (e.g., COWFISH) of area streams. There are also descriptions of soil and water conservation practices and of State requirements for protection of water quality in Appendix B. These requirements note that "monitoring must be in place to test whether BMPs are adequate to protect beneficial uses." Appendix page B-5 says that a monitoring plan for the EIS area has been developed and will be implemented, and that the plan is outlined in the appendix. EPA was unable to locate this monitoring plan within the appendix.

EPA is very concerned about the lack of more rapid improvement in riparian areas. As stated, the most effective alternative (Alternative C - no action), would still require "5 to 10 years to decades" for stream channels and riparian areas to recover fully to the original type and function. The Summary Table in Chapter II, pages 66 and 67 indicates that the proposed alternative will result in "slow improvement" to the stream channel, riparian vegetation, and fisheries habitat. Although the riparian trend would be upward it would still take a period of decades for most of the streams in the allotment to reach the desired future condition. Streams in the Upper Ruby drainage are in a degraded condition due to current and past overgrazing and trampling of riparian areas.

EPA also has the following comments by our Range Conservation Specialist. In May 1989 at the Riparian Resource Management Workshop (Billings, Montana), Lewis Myers presented a paper entitled "Grazing and Riparian Management in Southwestern Montana". A copy of this paper and an EPA document "Livestock Grazing on Western Riparian Areas" is enclosed for your review.

Mr. Myers' paper makes observations on long term livestock grazing management systems. His observations identify characteristics of successful and unsuccessful grazing systems (stocking rates, duration, days of post-grazing regrowth, etc.) in terms of accommodating riparian recovery. If Myers' observations are applied to the proposed Upper Ruby grazing alternative, they would appear to predict that the alternative proposed in the draft EIS would be **unsuccessful.** Myers' observations in particular indicate that duration of grazing treatments is a key factor in determining severity of impacts such as trampling and mechanical damage, soil compaction, and utilization. Myers' favors shorter durations of grazing in pastures than are proposed in the Upper Ruby draft EIS.

In accordance with Lewis Myers' observations, EPA feels that shorter duration-high intensity grazing systems should be considered on the Upper Ruby. EPA feels that existing fencing should not be removed as proposed in the draft EIS, since shorter duration-high intensity grazing would call for more pastures and fencing, not less.

EPA feels that much of the draft EIS lacks adequate information on current range conditions. The document references the range condition information used in the 1970 Allotment Management Plan. EPA feels a more current range inventory, which characterizes existing range site conditions and trends, should be done.

EPA also believes that water quality monitoring should be done in association with the implementation of the proposed grazing system changes in the Upper Ruby drainage to assess the

ecological conditions of affected streams, as the revised grazing system is put into effect. The ecological conditions of existing streams in the allotment area were characterized in Appendix A. A future assessment and characterization should be done for comparison purposes. EPA recommends a monitoring and assessment plan and a commitment to carry out that plan should be included in the final EIS.

Finally, EPA believes it is appropriate for the final EIS to address Forest Service manpower and resource requirements to implement and enforce revised grazing strategies.

In accordance with the criteria that EPA has established for rating draft environmental impact statements, we have rated this draft EIS as category EC-2 (Environmental Concerns - Insufficient Information). A copy of EPA's rating criteria is attached. If you need any further EPA assistance, please feel free to contact Jeff Bryan of my staff at (406) 449-5486 or FTS 585-5486.

Sincerely,

John F. Wardell, Director
Montana Office

Attachment

cc: Jennifer Harris, 8WM-EA
Dawn Roberts, OFA-A104
Ann Puffer, USFS, Region 1